

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

PATRICK LEONARD TIERNEY;

CASE NO. 2:20-cv-01245-RSM

PLAINTIFF,

VS.

CARRINGTON MORTGAGE SERVICES,  
LLC; AZTEC FORECLOSURE  
CORPORATION OF WASHINGTON; and  
THE BANK OF NEW YORK MELLON, f/d/a  
THE BANK OF NEW YORK AS TRUSTEE  
FOR REGISTERED HOLDERS OF CWABS,  
INC., ASSET-BACKED CERTIFICATES,  
SERIES 2004-5.

DECLARATION OF ERICA ST. LOUIS  
IN RESPONSE TO SUPPLEMENTAL  
DECLARATION OF SYNOVA  
EDWARDS OFFERED IN FURTHER  
SUPPORT OF DEFENDANTS' MOTION  
TO DISSOLVE TRO

NOTE ON MOTION CALENDAR:  
OCTOBER 2, 2020

DEFENDANTS.

*JURY DEMANDED*

I, Erica St. Louis, declare as follows:

1. I am an attorney at law, duly licensed to practice law in the State of Washington and am counsel of record for plaintiff Patrick Leonard Tierney ("Tierney"). The following facts are within my personal knowledge. If called upon to testify, I could and would competently testify to the matters set forth herein.

- 1 2. On December 28, 2020, I was served with the supplemental declaration of Synova  
2 Edwards (“Edwards”). [Dkt. 24]. The declaration is offered in further support of  
3 defendants’ September 30, 2020 Motion to Dissolve Temporary Restraining Order. [Dkt.  
4 11].
- 5 3. In her declaration, Edwards states that on December 28, 2020, she spoke with the King  
6 County Superior Court Cashier Clerk who advised her that Tierney failed to make the  
7 December 2020 monthly bond payment that was a condition of the July 22, 2020  
8 Temporary Restraining Order. In addition to being inadmissible hearsay, the testimony is  
9 untrue.
- 10 4. On December 17, 2020, Tierney sent, by certified mail, a cashier’s check in the amount  
11 of \$1,899.51 to the King County Clerk (\$1,889.51 bond and \$10 processing fee). The  
12 check was delivered to the King County Clerk at 3:50 pm on December 21, 2020, two  
13 days prior to the December 23, 2020 deadline. True and correct copies of the Chase  
14 Bank cashier’s check, the certified postage receipt and the delivery confirmation are  
15 attached hereto collectively as exhibit A.

16 I declare, under penalty of perjury, under the laws of the State of Washington, that the  
17 foregoing is true and correct.  
18  
19  
20

21 Dated:  
22 December 29, 2020

CREER LEGAL

23 By: /s/ Erica A. St. Louis  
24 Erica A. St. Louis WSBA # 28793  
25 *Counsel for Platiniff*  
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